UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CHRISTINE MAHARAJ,

Defendant.

INFORMATION

S5 15 Cr. 627 (ER)

USDC SDNY
DOCUMENT
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COUNT ONE

(Conspiracy to Commit Bank Fraud)

The United States Attorney charges:

1. From at least in or about January 2013 up to and including at least in or about May 2015, in the Southern District of New York and elsewhere, CHRISTINE MAHARAJ, the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It was a part and object of the conspiracy that CHRISTINE MAHARAJ, the defendant, and others known and unknown, willfully and knowingly, would and did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by,

and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

3. In furtherance of this conspiracy, and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On numerous occasions throughout 2014, CHRISTINE MAHARAJ, the defendant, submitted documents with forged signatures from homeowners to financial institutions in the Southern District of New York and elsewhere in order to obtain their approval for sales of homes.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

4. As the result of committing the offense alleged in Count One of this Information, CHRISTINE MAHARAJ, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, any and all property constituting and derived from any proceeds the defendant obtained directly or indirectly as a result of the commission of the offense charged in Count One of this Information.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982; Title 21, United States Code, Section 853(p); and Title 28, United States Code, Section 2461(c).)

Preet Bharara

PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. § 371.)

PREET BHARARA
United States Attorney